

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

KIMBERLY MARTINEZ, §
§
Plaintiff, §
§
v. § **CIVIL ACTION NO. 4:11-CV-734-Y**
§
§
T.V.O. NORTH AMERICA, LLC, §
Defendant. §
§
§

PLAINTIFF'S DESIGNATION OF EXPERTS

Plaintiff hereby discloses that the following experts may be called to testify in this case at trial:

1. Robert Lee
LEE & BRAZIEL, L.L.P.
1801 N. Lamar Street, Suite 325
Dallas, Texas 75202

Mr. Lee will testify as to the reasonableness, necessity and amount of attorneys' fees in this case. Mr. Lee is an attorney licensed to practice law in the State of Texas. He has not prepared a report regarding Plaintiff's attorneys' fees, however he may testify concerning the reasonable and necessary attorneys' fees incurred by Plaintiff in the prosecution of this lawsuit. Mr. Lee may also testify about the reasonableness and necessity of any attorneys' fees being claimed by Defendant in this matter. The basis of his opinion is his knowledge, skill, experience, training, and education with respect to civil litigation, in addition to his review of any documents provided to him. Mr. Lee's professional biography is attached hereto as Exhibit A.

2. J. Derek Braziel
LEE & BRAZIEL, LLP
1801 N. Lamar Street, Suite 325
Dallas, Texas 75202

Mr. Braziel will testify as to the reasonableness, necessity and amount of attorneys' fees in this case. Mr. Braziel is an attorney licensed to practice law in the State of Texas. He has not prepared a report regarding Plaintiffs' attorneys' fees, however he may testify concerning the reasonable and necessary attorneys' fees incurred by Plaintiff in the prosecution of this lawsuit. Mr. Braziel may also testify about the reasonableness and necessity of any attorneys' fees being claimed by Defendant in this matter. The basis of his opinion is his knowledge, skill, experience, training, and education with respect to civil litigation, in addition to his review of any documents provided to him. A copy of Mr. Braziel's professional biography is attached hereto as Exhibit B.

Respectfully submitted,

/s/ Robert (Bobby) Lee

Robert (Bobby) Lee

Attorney in Charge

Texas Bar No. 00787888

J. Derek Braziel

State Bar No. 00793380

Carmen Artaza

Texas Bar No. 24055114

Meredith Mathews

Texas Bar No. 24055180

Lee & Braziel, L.L.P.

1801 N. Lamar Street, Suite 325

Dallas, Texas 75202

(214) 749-1400 phone

(214) 749-1010 fax

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on April 16th, 2012, a copy of the foregoing document was electronically filed. Notice of this filing will be sent to counsel of record for all parties by operation of the Court's Electronic Filing System.

/s/ Robert (Bobby) Lee

Robert (Bobby) Lee